

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

ZIPIT WIRELESS INC., Plaintiff, v. BLACKBERRY LIMITED f/k/a RESEARCH IN MOTION LIMITED and BLACKBERRY COPORATION f/k/a RESEARCH IN MOTION CORPORATION, Defendants.) Civil Action No. 6:13-cv-2959-JMC)))))))))))
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Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.01, Plaintiff respectfully moves this Court to grant a 45-day extension of time for Defendants to respond to Plaintiff's Complaint.

1. Plaintiff Zipit Wireless Inc. ("Zipit") commenced this action on October 30, 2013.
2. On November 6, 2013, Zipit served the Summons and Complaint on defendant Blackberry Corporation.
3. Defendant Blackberry Limited has not yet been served with the Summons and Complaint.
4. The current deadline for defendant Blackberry Corporation to answer or otherwise respond to Plaintiff's Complaint is November 27, 2013.
5. Zipit has consented and agreed to Defendants request to seek a 45-day extension of time for Defendants to answer or otherwise respond to the Complaint.

6. In exchange for Zipit's agreement, defendant BlackBerry Limited has agreed to waive service of the Summons and Complaint and to deem that service on BlackBerry Limited had occurred on November 6, 2013.

7. If the Court grants this motion for an extension of time, the new deadline for Defendants to answer or otherwise respond to the Complaint would be January 13, 2014.

8. Defendants have not yet retained local counsel for this action. Accordingly, Plaintiff Zipit is filing this motion pursuant to Defendants' request. Defendants have consented to this motion and the extension requested herein.

WE CONSENT:

ROPES & GRAY LLP

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Greenville, South Carolina
 Dated: November 25, 2013

WE MOVE:

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